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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII

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DENVER, COLORADO 80202-2405

1990 MAY -1 A 8:05



APR 24 1990

Ref: 8HWM-FF

Mr. Robert M. Nelson, Jr., Manager  
U.S. Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

Dear Mr. Nelson:

This letter is drafted to provide EPA concurrence on the agreements reached pertaining to continued spray irrigation of effluents from the sewage treatment plant. State of Colorado comments and/or concurrence will be submitted in a separate letter. Although EPA is in general agreement with the six points presented within your March 21, 1990, letter, regarding the continuation of spray irrigation practices, this letter will serve to further clarify EPA concurrence on the conclusions presented within your letter. EPA acknowledges that there were conversations between EPA, CDH and DOE regarding this matter which led to the decisions presented in your letter. However, further evaluation of the potential impacts associated with spray irrigation practices is needed.

EPA is concerned about the spray irrigation practices east of the plant not only because of the poor application of "good engineering practices" by plant operators in the distant and near past. EPA is also concerned about continued use of spray irrigation due to the potential for these practices to exacerbate problems associated with existing contamination and for spray irrigation practices to create new contamination problems (e.g. the spray irrigation of chrome spill contaminated waters). As a result, EPA concurrence on continued use of spray irrigation is predicated on DOE's commitment to study and propose methods to eliminate discharges and impact to the environment including surface waters, ground waters and soil.

In addition, use of the eastern half of the east spray field must be discontinued if it is found that this practice aggravates problems associated with contamination related to the east trenches. Also, if it is found that contamination exists at the east spray field, the practice of spray irrigation on this field must be discontinued. Finally, EPA is concerned about construction of a new spray field south of pond B-3 prior to delineation of contaminant plumes associated with Operable Units 2 and 4. DOE must not construct or operate this field prior to determining that spray irrigation practices at this location will not aggravate the problems associated with contamination at

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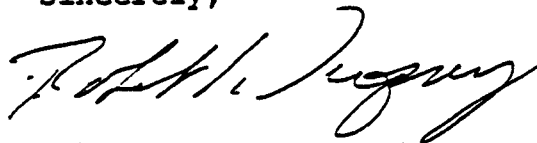
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Operable Units 2 or 4. If another spray field is required to meet the needs of the plant, EPA suggests expanding the field north of pond B-3 or constructing a new field in a location known not to be impacted by past disposal practices at the plant.

We hope this letter provides the information necessary for you to proceed with your activities directed at resolving this matter. If you should have any further questions regarding this matter, please contact Nat Miullo and Robert Shankland at (303) 294-1134 and (303) 293-1597, respectively.

Sincerely,



Robert L. Duprey, Director  
Hazardous Waste Management Division

cc: Nat Miullo, 8HWM-FF  
Robert Shankland, 8WM-C  
Peter Ornstein, 8RC  
Fred Dowsett, CDH  
Patty Corbetta, CDH  
John Haggard, CDH/RFPD